

# STATE OF COLORADO

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Douglas H. Benevento, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

February 4, 2005

Mr. Joseph Legare  
Director, Project Management Division  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, Colorado 80403-8200

**RE: Approval, Draft Closeout Report, IHSS Group 700-11, PAC 700-1108 – Bowman's Pond  
and IHSS 139(N)(a) – Steam Condensate Tanks, January 2005**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the revised report and, as a consequence, No Further Accelerated Action (NFAA) for IHSS Group 700-11. Comment resolution meetings and subsequent revisions were successful in resolving the Division's comments. Attached are the initial and additional comments from the Division and EPA.

The principle issues were:

- Demonstrating the adequacy of confirmation sampling in respect to compound and successive excavations to remediate PCBs (Aroclor 1254) to a Wildlife Refuge Worker Action Level.
- Clarifying the relationship between residual PCB levels and the RFCA Surface Water Action Levels and Standards for PCBs.
- Ensuring that PCBs are given special consideration in future surface water monitoring efforts.

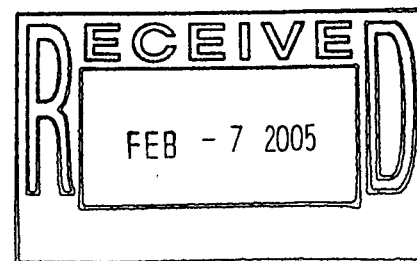
While considering Screen 4 of the Subsurface Soil Risk Screen, the Division noted that the May 28, 2003 amendment to RFCA Attachment 5, Table 1, incorrectly shows the standard to be 1.7E-04 mg/L, compared to 0.00017 ug/L (1.7E-04 ug/L), Water+Fish, of the current WQCD Regulation 31. Additionally, effective on 3/22/05, Regulation 31 will revise the PCB standard to 6.4E-05 ug/L (6.4E-08 mg/L), Water+Fish. The correct value must be used in evaluating the potential impacts of residual PCB upon surface waters.

We look forward to confirming that resolution of the principle issues, and minor additional changes, are reflected in the final document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337.

Sincerely,

Steven H. Gunderson  
RFCA Project Coordinator

Attachments (2)



C:\Documents and Settings\hainscou\My Documents\RFETS\700-11 IHSS Group Closeout Report Approval.doc

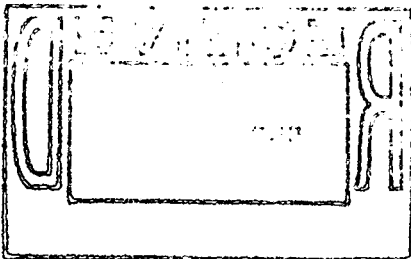
ADMIN RECORD

IA-A-002536

Mr. Legare  
February 4, 2005  
Page 2

cc: Mark Aguilar, EPA  
Larry Kimmel, EPA  
Dave Shelton, KH  
Steve Nesta, K-H

Mark Sattelberg, U.S.F&W  
Norma Castaneda, DOE  
Karen Wiemelt, KH  
Administrative Records Building T130G



Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Closeout Report

for

IHSS Group 700-11

PAC 700-1108 – Bowman's Pond and IHSS 139(N)(a) – Steam Condensate Tanks

December 2004

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**Specific Comments:**

1. **Executive Summary:**, For overall consistency please use the approach used in the next to last paragraph of page ES-1. That is, in the first paragraph of page ES-2, state that the second round of confirmation samples indicated the main Bowman's Pond excavation and the small area at the southern edge of the initial excavation was successful. Then follow with the statement that the western and mid-western areas remained above WRW ALs for PCB. The second and third paragraphs of ES-2 are currently consistent with the suggested approach.
2. The fourth paragraph should be revised. Currently, it interjects discussion of the Steam Condensate Tanks between a summary of the volume and type of material excavated from PAC 700-1108. It appears the discussion of sediment was, or should be, discussed in the fourth paragraph of Page ES-1. Please separate the discussions.
3. **Section 2.0:** Table 2, as referenced, is included in the List of Tables as appearing on page 13. Table 2, a confirmation data summary, and page 13, are missing. Tables 1 and 3 are correct and shown as indicated. Please address.
4. **Table 1:** SVOC and PCBs had been established as the primary COCs for the IHSS Group. However, there was insufficient sample for SVOCs for not only the surface, but also the 0.5-2.0 foot subsurface interval. The Division understands that a standard protocol exists that places lower priority for SVOC analyses; however, that should not serve as relief from sampling and analyzing as the primary COCs dictate. Please review the issue to determine whether excavation for PCB's, or other data, has mitigated the lack of data.
5. Additionally, beginning with CG49-036 on page 7, rather than "western sidewall", "western excavation slope" would alleviate the Division's earlier concern that overlying soil or sediment could be contaminated. If the soil had been removed before the sample was collected, reporting the depth, as shown, is acceptable. However, "sidewall", suggesting a vertical cut with overlying soils, is misleading to the public.
6. **Section 4.0:** Please delete the 2<sup>nd</sup> or 3<sup>rd</sup> redundant sentence.
7. Additionally, reference to Figure 4 as showing "soil remediation areas" is not evident. It appears the new Figures 5 thru 8 show the areas. Please address.
8. **Section 4.1, Western Excavation:** As discussed at the meeting on January 6, 2005, please clarify that the initial excavation had not extend westerly to the extent necessary to remediate soils represented by characterization location CG49-012.

9. In the third bullet of the sub-section, please consider whether sidewall is an appropriate designation (it may be in this specific instance)
10. Mid-western Excavation: In the first, third, fourth and fifth bullets of the sub-section, please consider whether sidewall is an appropriate designation. See Comment No. 5.
11. Bowman's Pond Excavation and Section 5.0 Please extend Comment No. 10.
12. Section 7.0, Screen 1: The references to the tables and figures need to be changed or deleted. The subtle reference to "relevant" subsurface data is insufficient since Tables 3 and 4 show various WRW AL exceedances. Likewise, Figures 3 and 4, plus new Figures 5 thru 8 do not provide a clear demonstration, to the public, that residual PCB levels are below ALs.
13. Screen 4: Please revise or expand the discussion to specifically include residual PCBs. The removal of PCBs below WRW ALs is not indicative of the potential for PCBs to reach surface waters; especially given that the Bowman's Pond site is part of the surface water drainage system. [Note: the May 28, 2003 amendment to RFCA Attachment 5, Table 1, incorrectly shows the standard to be 1.7E-04 mg/L, compared to 0.00017 ug/L (1.7E-04), Water+Fish in the current WQCD Regulation 31. The PCB standard, effective 3/22/05, has also been lowered (more stringent) to 6.4E-05 ug/L (6.4E-08 mg/L), Water+Fish. The correct value must be used in evaluating the potential impacts of residual PCB upon surface waters.]
14. Section 8.3: Pending the revision of Screen 4, it may become necessary to include additional long-term monitoring for PCBs. Address if necessary.
15. Section 10.0: Reference to Figure 5 should now be expanded to include Figures 6 thru 8.
16. Section 13.0: Figure 6, and the reference to it, should be changed to Figure 10.
17. Table 22: Since "Gas proportional counter" is not an analytical method of concern, and there were no duplicates, it should be removed or clarified.
18. Table 24: The table shows that eight Method SW 6200 records were rejected. The narrative preceding the table states that no records were rejected. Please address.
19. Section 14.3: See Comment No. 18, records were rejected.
20. Appendix A: The map reference in the CR dated 11/29/04 is missing, please include.

Comment via E-mail: I'm disappointed with the short shrift given PCBs in Screen 4. Yes PCB's are mentioned, but nothing that really conveys the magnitude, or lack thereof, of the treat to surface water. Yes, the stewardship section notes the special consideration that they will be given, but with Screen 4 lacking depth on the issue, that is not reassuring. The lack of analytical data to indicate whether we have a current, not merely future, threat was noticeable on the second reading. On the first reading, it was as if PCB's were barely a concern. Let's talk. Harlen

>>> "Serreze, Susan" <[Susan.Serreze@rfets.gov](mailto:Susan.Serreze@rfets.gov)> 01/27/05 03:22PM >>>  
Harlen - how are you doing on an approval letter for 700-11? Thanks.  
susan

**EPA Comments for Draft Closeout Report  
IHSS Group 700-11  
December 2004**

**December 22, 2004**

**Specific Comments**

- 1.0 **Page 55, Section 13.0.** Please include a statement in this section that these data have been marked in the database so that they will not be used in the sitewide Comprehensive Risk Assessment or other site analyses.
- 2.0 **Page 66, 2<sup>nd</sup> paragraph.** According to Table 20, silver also has a percent recovery that is 0. Please add a statement in this paragraph to that regard.
- 3.0 **Page 74, 1<sup>st</sup> paragraph and Section 14.3.** These paragraphs state that the validation goal for RFETS is 25 percent. This should be restated to say that the *verification* and validation goal is 25 percent.
- 4.0 **Page 74, last sentence.** This sentence states, "Data collected and used for IHSS Group 400-2 are adequate for decision making." Please change the IHSS Group to 700-11.

**EPA Comments for Revised Draft Closeout Report  
IHSS Group 700-11  
January 2005**

**February 3, 2005**

**Specific Comments**

1. **Page 74, first complete paragraph, fourth sentence.** The sentence states, iron and silver had 0 percent recovery as a low." With the addition of page 75, which was omitted from the first draft, manganese should also be included as having a 0 percent recovery.
2. **Page 82, Section 14.3, second sentence.** This sentence states, "No records were rejected." However, Table 24 identifies 8 records rejected for EPA Method SW-846 6200. The sentence should be revised accordingly.
3. **Page 83, Section 15.0, second paragraph.** This paragraph summarizes the first two excavations. Please include a short summary on the third and fourth excavations.